

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

v.

11 CR 199 (S-1) (CBA)

BENITO LÓPEZ-PÉREZ,
JOSÉ GABINO BARRIENTOS-PÉREZ,
alias "Ricardo," and
ANASTASIO ROMERO-PÉREZ,

STATEMENT IN SUPPORT OF
REQUEST FOR EXTRADITION
PURSUANT TO 28 USC § 1746

Defendants.

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I, Jane Doe 3 under penalty of perjury, make the following true and accurate statement:

1. I am a citizen of Mexico and currently reside in the United States.
2. In 2002, when I was 15 years old and I was working at a market in Mexico City, I met a man who introduced himself as "Ricardo," and we began a romantic relationship. Later I found out that Ricardo's real name is JOSÉ GABINO BARRIENTOS-PÉREZ. After approximately one year, I moved to Tenancingo, Tlaxcala, to live with BARRIENTOS-PÉREZ and his family. In 2003, I had a son with BARRIENTOS-PÉREZ.
3. Approximately one year after the birth of our son, BARRIENTOS-PÉREZ asked me if I would start to work as a prostitute. Initially, I refused, but after BARRIENTOS-PÉREZ pressured me continually for approximately two months, saying that we were in debt and needed money to pay our expenses and take care of the baby—whose premature birth had resulted in a

ton of medical bills—I finally gave in and agreed to work as a prostitute.

4. BARRIENTOS-PÉREZ and his brother, ANASTASIO ROMERO-PÉREZ, took me and ROMERO-PÉREZ's wife to Tijuana, Mexico to work as prostitutes. In Tijuana, [REDACTED] taught me how to work as a prostitute, including how to use condoms and how much to charge the clients. The clients paid the equivalent of \$20 (United States dollars) for 15 minutes. I did not want to continue in this line of work, but BARRIENTOS-PÉREZ beat me on several occasions in order to force me to work.

5. Between approximately 2004 and 2006, at the request of BARRIENTOS-PÉREZ, I worked as a prostitute in Tijuana and in Mexico City. Part of my earnings paid for the medical care of our son, who had respiratory problems due to his premature birth. In March of 2005, I gave birth to a second son fathered by BARRIENTOS-PÉREZ.

6. In 2006, BARRIENTOS-PÉREZ's brother, BENITO LÓPEZ- PÉREZ, who had taken two women to the United States to work as prostitutes, got in touch with BARRIENTOS-PÉREZ and told him that he (BARRIENTOS-PÉREZ) should send me to work in the United States because the money was better.

7. In 2006, BARRIENTOS-PÉREZ sent me to the United States with smugglers. BARRIENTOS-PÉREZ stayed in Mexico. United States authorities detained me several times at the border before I was able to cross successfully into the United States in about April, 2006. After I entered the United States, I was taken first to Phoenix, Arizona, and then to Las Vegas, Nevada. From there, I flew to New York City, where [REDACTED], LÓPEZ- PÉREZ's wife, picked me up at the airport.

8. In New York City, I first lived in an apartment with [REDACTED]. LÓPEZ-PÉREZ did not live with us. Shortly after we moved to another apartment, [REDACTED] returned to Mexico. After that I lived with another one of LÓPEZ-PÉREZ's women named [REDACTED]. BARRIENTOS-PÉREZ threatened to beat me if I did not want to work or if I did not make enough money.

9. While I was in New York, I worked as a prostitute under the name [REDACTED], which is my sister's name. Every day, I was taken by car to different places around the city to work in prostitution. I would receive \$25 from each client. I would pay half of that money to the driver, and I would wire the rest of the money that I had earned to BARRIENTOS-PÉREZ in Mexico.

10. Around the end of the summer of 2006, I went back to Mexico to see my children. BARRIENTOS-PÉREZ made me reenter the United States illegally in May, 2007 so that I could go back to work as a prostitute in New York City.

11. In or about September 2007, I again told BARRIENTOS-PÉREZ that I no longer wanted to be with him or work as a prostitute. I went back to Mexico, and BARRIENTOS-PÉREZ and I tried to run two small businesses in Mexico, but they both failed. Consequently, BARRIENTOS-PÉREZ forced me to go back to working in prostitution.

12. At some point in 2008, I took my sister, Jane Doe 2 [REDACTED] to Tenancingo in order for her to take care of my children. In or about May 2009, BARRIENTOS-PÉREZ ordered me to unlawfully reenter the United States and travel to New York to work again as a prostitute.

Subsequently, I wired between \$700 and \$1,000 or more every week to BARRIENTOS-PÉREZ or his mother in Mexico.

13. In or about July 2009, I started to send less money to BARRIENTOS-PÉREZ because I needed to send money to my sister (another sister, not JD 2), who had been injured in an automobile accident. BARRIENTOS-PÉREZ got mad because I was not sending him as much money, and on several occasions he threatened that he would not let me see my children if I did not send him more money.

14. Around the spring of 2010, I found out that my sister, JD 2, had been forced into prostitution by BARRIENTOS-PÉREZ's brother, ANASTASIO ROMERO-PÉREZ ("ROMERO-PÉREZ"). I saw JD 2 for the first time in New York City when a driver who was transporting me stopped to pick up another girl who turned out to be JD 2. When she saw me, JD 2 ran away from the vehicle. Later, I tried to get in touch with her, but ROMERO-PÉREZ would move JD 2 constantly and change her phone number.

15. In or about September 2010, a driver who had recently transported my sister put me in contact with her. Shortly thereafter, my sister and I began living together in an apartment in Queens, New York, and she told me that ROMERO-PÉREZ had forced her to work as a prostitute. I continued working and sending money to BARRIENTOS-PÉREZ and his mother in Mexico.

16. On or about October 12, 2010, United States Homeland Security Investigations (HSI) Special Agents found JD 2 and me near our apartment in Queens. When the agents found me, I was in a car that was taking me home after

a night of work. I had in my possession half of my earnings from that night, as well as unused condoms. I had given the other half of my earnings to the driver before the HSI agents detained us.

17. After I was recovered by law enforcement authorities, I continued to call my children and BARRIENTOS-PÉREZ. In one of those calls, BARRIENTOS-PÉREZ accused me of talking to law enforcement authorities and he threatened to not let me see my children again. BARRIENTOS-PÉREZ then ordered me not to call him or my children in the future. He told me that he would initiate every future call between my children and me in order to make sure that I was not with the police.

18. **Attachment G-1** to this statement is a photograph of BENITO LÓPEZ-PÉREZ. **Attachment G-2** to this statement is a photograph of JOSÉ GABINO BARRIENTOS-PÉREZ. **Attachment G-3** to this statement is a photograph of ANASTASIO ROMERO-PÉREZ.

19. Given the limited purposes of this statement, I have not set forth herein all of the facts related to this matter of which I have knowledge.

I declare under penalty of perjury that the foregoing is true and accurate.

Signed, this 18th day of November, 2011.

Jane Doe 3